

# EXHIBIT O

**In the Matter Of:**

**UNITED STATES vs STATE OF GEORGIA**

1:16-CV-03088-ELR

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**LISA FUTCH**

*October 25, 2022*

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1     ourselves. The DOE does not do this on our  
2     information. We talk through it at the end with  
3     them -- Okay? -- but this is really -- the only  
4     time we complete this plan here is at our  
5     post -- Okay? -- for the other two, we don't.

6             And the self-assessment itself, like  
7     the first one is not even required. Some of us  
8     do it, some of us don't, but the mid-year, the  
9     one before December, January is required and the  
10    post.

11            So this is just -- this last one is  
12    done as a result of our post ratings and this  
13    document here basically talks about, you know,  
14    our priority, you know, where we're prioritizing  
15    for the upcoming year and what -- you know, or  
16    how we plan to sustain, if we got a higher  
17    rating, how we plan to sustain that, or how  
18    we're going to make improvements in that area if  
19    it's a low rating.

20            Q     Okay. As part of the self-assessment  
21    or as part of the strategic plan process, it  
22    sounds like you have an opportunity to sit  
23    down -- or maybe you should tell me.

24            Is there an opportunity where you're  
25    able to sit down with state DOE personnel to

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1 talk through your plan and assessments?

2 A Yes. They actually send us -- now  
3 before COVID, they actually came to every  
4 program. But after COVID, they send us an  
5 e-mail with our dates for our virtual meeting  
6 and, of course, we have -- they give us a  
7 deadline to have everything submitted because  
8 all the documentation actually goes into the DOE  
9 portal. And so we get our date, our meeting  
10 date is virtual, and we do it virtually and we  
11 go through it.

12 Q Who from the state DOE participates in  
13 this meeting?

14 A Vickie Cleveland and Lakesha Stevenson.

15 Q And when you say you go through the  
16 plan, what does that look like? Are they  
17 providing you with feedback? What else happens  
18 during those meetings?

19 A Yes. They provide us with feedback.  
20 So we go through each area, you know, with our  
21 ratings and, you know, I'm pretty honest with,  
22 you know, weaknesses and stuff, but, you know,  
23 they provide us with feedback and then, you  
24 know, I think at the end -- you know, and they  
25 tell us typically whether they agreed or not.

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1           Like -- you know, and it's really not  
2           threatening at all, you know, and, you know,  
3           based on, you know, they'll say, well, you know,  
4           well, you know, I agree with that, yeah, and  
5           I've not ever had them disagree or anything with  
6           me. I mean, I'm not really waiting for them to  
7           agree. They don't automatically say it, but  
8           most of the time they do, and so that's pretty  
9           much it.

10          Q       And earlier you mentioned that at the  
11           beginning, the state DOE would provide the  
12           programs with the state's own rating; is that  
13           correct?

14          A       Yes. The first two, if I'm not  
15           mistaken, the first two ratings actually ranked  
16           us, and I don't know if they meant to do that  
17           but it ranked us by scores and they sent it out  
18           to everybody.

19          Q       Okay.

20          A       I don't know if they meant to do that.  
21           Maybe they just meant to list it, I don't know  
22           but -- but they stopped doing that. I think a  
23           lot of GNETS directors complained.

24          Q       Okay. I was just going to ask you, do  
25           you know why that changed?

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1 is the fiscal agent of Coastal. So they decided  
2 to go there with Oconee and RESA at that point.  
3 And it has been -- I mean, it did what I thought  
4 it would do, if that makes sense as far as  
5 staffing purposes and focus and all for Coastal  
6 Academy.

7 Q And you said that change took effect  
8 this current school year?

9 A Yes.

10 Q Have there been any other changes in  
11 the school districts or counties served by  
12 Coastal Academy in the last five to six years?

13 A Yes. Wayne County was served by  
14 Cedarwood, and I believe that was four years  
15 ago, and they came to me because they're Baxley,  
16 the Baxley site.

17 One of their sites closed, the  
18 Cedarwood sites, and my Liberty site was closer,  
19 actually, only 20 minutes or 30 minutes from  
20 them to transport their kids versus where they  
21 were going to have to transport them -- or  
22 actually -- yeah.

23 And so Wayne County came over to then  
24 Coastal Academy. And that was a very easy swap  
25 because Coastal Academy and Cedarwood have the

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1 same fiscal agent, First District RESA, so yeah.

2 Q When these changes are made, do you  
3 have to alert the state DOE?

4 A I do, and I did.

5 Q And what is their role, if any, in the  
6 process after they've been alerted?

7 A Well, with the Wayne County one, you  
8 know, they really were like, oh, this is simple,  
9 you guys are under the same fiscal agent, yes.  
10 You know, they just kind gave us some guidance,  
11 you know, with that and noted, you know, that  
12 swap.

13 And with the Camden County this year, I  
14 got, okay, let me know when, you know, the  
15 decision is made, and I tried to get some  
16 guidance but I got -- you know, because this was  
17 a bigger issue because it wasn't the same fiscal  
18 agent. We have materials. We have inventory.  
19 We have, you know, all these things and, you  
20 know -- so told me to talk to my business folks  
21 at First District RESA.

22 So I talked to them, they told me to  
23 talk to my person at the DOE, which I had  
24 already talked to and went back to and, you  
25 know, they referred me to somewhere else and we

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1 just eventually wound up working it out between  
2 the two RESA's and GNETS programs.

3 Q I'm going to show you a document. One  
4 moment.

5 I'd like for the court reporter to mark  
6 this next document as Plaintiff's Exhibit 542.

7 (Whereupon, Plaintiff's Exhibit  
8 Number 542 was marked for  
9 identification.)

10 BY MS. HAMILTON:

11 Q And, Ms. Futch, I'm now showing you  
12 Plaintiff's Exhibit 542. This is an e-mail  
13 dated March 21, 2019.

14 A Yes.

15 Q From you to Vickie Cleveland, other  
16 individuals copied. The subject is Wayne County  
17 School System GNETS relocation FY20 --

18 A Uh-huh.

19 Q -- as an attachment. The first page --  
20 I'm just going to scroll down -- is Bate stamped  
21 GA01064131.

22 A Uh-huh.

23 Q I'll give you control if you want to  
24 take a quick moment to scan the document and  
25 then let me know when you're ready.



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1           A       I remember this document, but I just  
2       want to look at the plan again.

3           Q       Okay.

4           A       And I remember this -- the plan -- I  
5       mean, the -- what -- when this was developed as  
6       well.

7           Q       Okay.

8           A       Yes. Yes, it's mine.

9           Q       All right. So is this communication  
10      connected to what you were sharing a moment ago  
11      about Wayne County becoming part of your GNETS  
12      program?

13          A       Yes. And we did -- we had a -- this  
14      document was provided to us by the DOE, provided  
15      to all GNETS directors because there had been a  
16      couple others that had changed or whatever GNETS  
17      programs or whatever and they'd been provided to  
18      us at that time and which, you know, was  
19      somewhat helpful.

20                 It helped me think through the process,  
21      plan it out, things that needed to be done, and,  
22      you know, again, we were supposed to submit that  
23      to the DOE and, you know, they would give us any  
24      feedback or guidance and, you know, take it from  
25      there or whatever. And that we did and it went

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1 extremely, extremely smooth, but for the  
2 Camden --

3 Q Okay. And I'm just going to scroll  
4 down to the -- this plan that you're referring  
5 to.

6 Is this document still currently being  
7 used?

8 A No. Well, I asked about it.

9 Q Do you --

10 A Yeah, I don't know about any others,  
11 but I asked about it for this past Camden and I  
12 was told, no, that we just needed to let them  
13 know.

14 Q Okay. So you -- this form GA -- the  
15 state DOE was not using this form when you were  
16 doing the Camden transition?

17 A Yeah.

18 Q Okay. I just want to look at a few of  
19 the areas that are listed here as part of the  
20 reintegration or relocation action plan.

21 A Uh-huh.

22 Q So what was your understanding of the  
23 purpose of this document?

24 A My understanding was just that -- you  
25 know, that this would be a plan that we would

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1 approve even before my fiscal agent does, so it  
2 goes there, so.

3 Now, federal, it's a little more -- the  
4 federal regs are a little stricter on what we  
5 can and can't use money for, but we follow those  
6 federal regs that all our local school systems  
7 have to follow with IDA money. And -- but,  
8 again, it's, you know, in addition to, you know,  
9 support, you know, what's needed.

10 And, of course, then we answer those --  
11 well, not answer, but, you know, especially if  
12 it's interventions and things that we're buying,  
13 we have to make sure that we appropriately  
14 categorize them, you know, rate them under  
15 evidence-based or, you know, those types of  
16 things.

17 Q I want to show you a document, and I  
18 would like for the court reporter to mark this  
19 is Plaintiff's Exhibit 552.

20 (Whereupon, Plaintiff's Exhibit  
21 Number 552 was marked for  
22 identification.)

23 BY MS. HAMILTON:

24 Q Ms. Futch, I'm currently showing you  
25 Plaintiff's Exhibit 152.

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1 A Yes.

2 Q This a March 2018 e-mail chain between  
3 you, Vickie Cleveland, and Amber McCollum and  
4 some other individuals. The Bates stamp number  
5 on this document is GA000829 --

6 A Uh-huh.

7 Q -- 98.

8 A Uh-huh.

9 Q Let me make sure -- let me give you  
10 control just to take a moment to scroll through,  
11 and then let me know when you're ready.

12 A Yes, I'm ready.

13 Q Okay. Do you recognize this document?

14 A I do.

15 Q Okay. So I want to start at the  
16 beginning of the e-mail chain. This was the  
17 e-mail dated March 13th, 2018 that you sent to  
18 Amber McCollum and Eric Moody.

19 Do you see that?

20 A I do, uh-huh.

21 Q Who is Amber McCollum?

22 A At that time, I believe she was like  
23 one of the program specialists or program  
24 manager. Like, she was our budget -- you know,  
25 everybody is assigned a district -- a budget

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1 person. She was our budget -- GNETS budget  
2 person.

3 Q Okay. And who is Eric Moody?

4 A He is the CFO at First District RESA.

5 Q What was the issue that you were  
6 bringing to their attention?

7 A Well, I -- again, somata sensory input  
8 here. I am starting or beginning the  
9 implementation of my trauma-informed care. I  
10 had done a little bit of research in this and  
11 aromatherapy and things of such and combining  
12 other whatever.

13 I wanted to spend some grant money to  
14 provide this at -- for all students at -- like a  
15 diffuser in each classroom with the oils, right?  
16 And so I wanted at first to use federal money  
17 because, you know, my understanding, it is a,  
18 you know -- I have the research and I did, later  
19 on, send additional research that -- where it's  
20 based off of and it -- you know, for  
21 intervention purposes and the impact it has on  
22 mood and, you know, brain and regulation and  
23 things like that.

24 So I asked if I could use federal money  
25 instead of state, and Amber said, no, that

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1 needed to be in IEP. And I was like, oh, Amber,  
2 please. No, I didn't say that but, you know,  
3 everything that we buy in federal dollars is not  
4 always in the IEP, you know, but that's okay. I  
5 went back because, you know -- and, I mean, I  
6 had the state money so I just took it out of  
7 state.

8 Q And it looks like you also -- Vickie  
9 Cleveland was also added to the e-mail chain at  
10 some point.

11 What was her position on whether  
12 federal funding could be used?

13 A Well, I had discussed it with her  
14 first.

15 Q Okay.

16 A Yeah, and she recommended, you know --  
17 well, I discussed it with Eric Moody first,  
18 who's my CFO, and he was like, talk to Vickie,  
19 talk to your DOE. I talked to my person,  
20 Vickie, and Vickie said, you know what? I think  
21 so but I'm not sure, let's talk to Amber. And  
22 so that's why I cc'd her, just make her, you  
23 know, knowledgeable that I had done that.

24 Q Okay. So their position, ultimately,  
25 was that federal funding couldn't be used to

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1 cover those expenses --

2 A Yes.

3 Q -- is that correct?

4 Okay. And state funding was  
5 appropriate for those expenses?

6 A Yes, uh-huh.

7 Q Okay. And what is your sense regarding  
8 the distinction between when you can use federal  
9 funding versus state -- GNETS state grant  
10 funding --

11 A I'm going to be honest with you, they  
12 go back and forth. And so my sense, I mean, I'm  
13 like, um, so -- but my sense -- I can tell you  
14 this, it is easier to buy with state money than  
15 federal, just, I mean, -- and I know that  
16 everything, there has to be, I mean, justified,  
17 of course, and research-based, and I've never  
18 asked for anything that wasn't.

19 But, you know, as far as federal cost,  
20 again, federal regs and the DOE, they're a  
21 little more, they're -- you know, they're more  
22 strict, more rigid with federal dollars.

23 Q Okay. I'm going to show you another  
24 document.

25 I'd like for the court reporter to mark

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1 this document as Plaintiff's Exhibit 553.

2 (Whereupon, Plaintiff's Exhibit  
3 Number 553 was marked for  
4 identification.)

5 BY MS. HAMILTON:

6 Q Ms. Futch, I'm showing you Plaintiff's  
7 Exhibit 553. This is a January 20th, 2022  
8 e-mail request from you to Vickie Cleveland with  
9 the subject line, project based learning.

10 A Uh-huh.

11 Q And I also note that there is an  
12 attachment to this document. The Bates stamp  
13 number is GA00357358.

14 If you want to take a moment to look at  
15 it, feel free.

16 A Yeah, I know what it's -- yeah.

17 Q Okay. Do you recognize this document?

18 A I do.

19 Q Okay. On January 20th, 2020, you  
20 e-mailed Vickie Cleveland to inquire whether you  
21 could use state funds for project-based learning  
22 activity; is that correct?

23 A Yes.

24 Q What was the activity?

25 A It was -- I believe that my -- this was



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1 my teacher that was in my autism room, so it was  
2 project-based learning. And, again, to make  
3 sure -- it was a gardening project with  
4 students, so -- and growing, things like that.

5 Q Okay. Why did you believe that this  
6 purchase should be covered by state funds?

7 A Well, I mean, actually, I was a hundred  
8 -- almost -- well, 90 percent sure it should be  
9 state funds and I had called prior to writing  
10 this e-mail, Eric Moody, and said Eric,  
11 heads-up, this is what I called for. I called  
12 to let him know I'm buying this, you know, or  
13 going to submit this and I don't want you to  
14 think this is what this is for because, you  
15 know, I'm asking for seeds and things like that.

16 And he said, oh, yeah, state is -- it  
17 probably can come from state, but reach out to  
18 Vickie Cleveland and make sure or reach out --  
19 he calls her my DOE person to make sure and I  
20 said, okay. So my RESA e-mail for things  
21 documented it, so I did.

22 And the reason I thought it should be  
23 state is after the last thing, I was pretty sure  
24 it wasn't going to be federal. And -- and  
25 anyway, so that's the e-mail and, yeah, it was

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1 state.

2 Q Okay. And so I don't have the response  
3 that you received from Ms. Cleveland, but are  
4 you confirming that she did say this --

5 A Yeah, she didn't respond to me in an  
6 e-mail, she called me and she told me state was  
7 fine.

8 Q Okay. Did Amber McCollum need to be on  
9 this e-mail chain?

10 A You know, I don't know. You know, she  
11 was on the first one just because Vickie told me  
12 to e-mail her, you know, and -- but this was --  
13 you know, and I -- see, I'd called Vickie on  
14 that first one prior to e-mailing her so this, I  
15 just shot Vickie an e-mail, I mean, you know,  
16 like my first step, so...

17 Q Okay. But it's not a formal protocol  
18 where you have to copy --

19 A No, there is no formal protocol for any  
20 -- no, none. This is just me, you know, doing  
21 what RESA told me, but also, I mean, you know,  
22 trying to make sure I do the right thing, you  
23 know?

24 Q Okay. I'm going to next show you  
25 another document.

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1 A Yes, uh-huh.

2 Q I'm going to show you another document.

3 And I'd like for the court reporter to  
4 mark this as Plaintiff's Exhibit 557.

5 (Whereupon, Plaintiff's Exhibit  
6 Number 557 was marked for  
7 identification.)

8 BY MS. HAMILTON:

9 Q Ms. Futch, I'm now showing you 557,  
10 which has a title, Request for a GNETS  
11 consultation, which this is another document  
12 that we received in response to our request for  
13 production of documents from --

14 A Uh-huh.

15 Q -- Coastal Academy with our internal  
16 numbering of 022997.

17 Do you recognize this document?

18 A You want to scroll down so I can see  
19 the rest of it or do you want me to?

20 Q Looks like there's one more --

21 A Okay. So it's just the blank one.  
22 Yes, I do.

23 Q Okay. Is this the request for GNETS  
24 consultation form that you referenced a moment  
25 ago when we were discussing flow charts?

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1 A Yes, ma'am.

2 Q Who created this document?

3 A The -- that same committee.

4 Q Okay. And by "same committee," you're  
5 referring to the strategic plan?

6 A Yeah. The committee that was developed  
7 from the strategic plan to do this, yes.

8 Q Okay. And that was -- okay. And was  
9 this document shared with all of the GNETS  
10 programs?

11 A Yes, yes, uh-huh. It's the one we were  
12 told to use, yes.

13 Q And who told you to use it?

14 A Well, DOE, so that we would have a  
15 common request for GNETS consultation. So that  
16 was, you know -- part of that, again, strategic  
17 plan development was to, you know, ensure that  
18 GNETS programs, all 24 of us, you know,  
19 implemented a set of common best practices and  
20 had some common themes, so yeah.

21 Q Okay. And was that also a similar goal  
22 for the flow chart?

23 A Yes.

24 Q All right. So I'm going to return now  
25 and stop sharing this document and I'm going to

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1 Yeah, that's -- oh, good. Okay. Hey.

2 Q This is helpful. I'm going to have you  
3 confirm for me whether this is what you're  
4 referring to, but this is a document I'd like  
5 for the court reporter to mark as Plaintiff's  
6 Exhibit 558.

7 (Whereupon, Plaintiff's Exhibit  
8 Number 558 was marked for  
9 identification.)

10 BY MS. HAMILTON:

11 Q It is titled the Confidential Student  
12 Information Packet for GNETS and we received  
13 this document from Coastal Academy in response  
14 to Item 7 in our subpoena for production of  
15 documents.

16 Ms. Futch, I'm going to give you  
17 control.

18 A Okay.

19 Q Just so you can scroll through since  
20 there is a few pages here.

21 A Yes.

22 Q Okay. And do you recognize this  
23 document?

24 A I do.

25 Q Is this the student information packet

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1 that you were referring to a moment ago in  
2 connection with the standards process?

3 A Yes.

4 Q Who created this document?

5 A Again, that committee that was  
6 developed from the strategic plan.

7 Q Okay.

8 A For this.

9 Q And is this another document that the  
10 state DOE wanted the GNETS programs to use as a  
11 standard document across the programs?

12 A Yes.

13 Q All right. I'm going to stop sharing  
14 this document and return back to Plaintiff's  
15 Exhibit 556, the GNETS Services Flow Chart.

16 Where we left off, Ms. Futch, you were  
17 just explaining that that packet is completed.

18 Once it's completed, what happens next?

19 A It's then sent to the, you know, GNETS  
20 coordinator, you know, however it's set up with  
21 each GNETS program. So here it's sent to the  
22 coordinator. Okay.

23 And the coordinator, you know, gives it  
24 a nice review and, you know, calls special ed  
25 director, and -- anyway, an IEP meeting is set

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1 And that's issued for one year, and  
2 within that year, that candidate has to get  
3 enrolled in a teaching education program or  
4 Georgia -- program of some sort and then provide  
5 that documentation to PSC, and then that -- the  
6 PSC issues or extends that provisional  
7 certificate for an additional two years.

8 Q Okay. And who makes the decision as to  
9 whether provisionally certified teachers can be  
10 hired within your program?

11 A Well, ultimately, the Board of Control,  
12 but I make the recommendation to the executive  
13 director of RESA and he makes it to the Board of  
14 Control.

15 Q Okay. And would you agree that the use  
16 of provisional -- provisionally certified  
17 teachers provides more flexibility in terms of  
18 staffing and addressing staffing shortages?

19 A Absolutely.

20 Q Okay. And I've got just a couple more  
21 questions.

22 Going back to IEP teams and placement  
23 in GNETS.

24 To your knowledge, has there ever been  
25 a state representative on an IEP team?

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1 A Yes.

2 Q Okay. How many instances would you say  
3 that that occurred?

4 A One time.

5 Q One time?

6 A Uh-huh.

7 Q And was that while you were the  
8 director -- director in your current capacity?

9 A Yes.

10 Q Okay. Do you know who the state member  
11 was?

12 A Zelfhine Dixon when she was in her role  
13 as director, state director of special  
14 education.

15 Q Okay. And other than that instance,  
16 are you aware of any other instances in which  
17 the state participated in an IEP team decision?

18 A No.

19 Q Okay. And has the state ever  
20 encouraged you to make a placement decision  
21 contrary to the IEP team's recommendation?

22 A No.

23 Q Okay. And lastly, we discussed a few  
24 documents, they were the Coordination of  
25 Services Flow Chart, the Request For GNETS



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1 Consultation, the Confidential Student  
2 Information Packet, and The Guiding Questions  
3 For Consideration of Services.

4 A Yes.

5 Q And I believe you testified that you  
6 were told to use these documents by the Georgia  
7 Department of Education; is that right?

8 A We were -- again, the committee was set  
9 up as -- also that strategic plan, developed  
10 those documents.

11 They were provided to us from Pat Wolf,  
12 who was a GNETS director at one of the GNETS  
13 directors meetings to discuss with draft  
14 written, and then they were sent to us via  
15 e-mail from the DOE.

16 And so I -- and honestly, I did testify  
17 that I was told and so -- and, again, I recall  
18 them saying we -- you know, all -- you know,  
19 them being discussion taking place at that  
20 particular GNETS directors meeting among the  
21 directors and DOE and us making a  
22 recommendation, you know, that we were -- and,  
23 you know, DOE, you know, to use these moving  
24 forward.

25 And then we did and that e-mail came

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1 from DOE to do so -- I mean, to -- with these  
2 documents attached.

3 Q Okay. Do you understand it to be a  
4 requirement from DOE to use the documents?

5 A Yes. I felt like it was a requirement.  
6 I do understand it that way.

7 Q Okay. And is there any written policy  
8 or anything other than the e-mail that you  
9 referenced in support of it being a requirement?

10 A No. I think the language in the  
11 strategic plan is something along the side,  
12 having uniformity, documents or whatever, but I  
13 don't know of anything else, no.

14 Q Okay.

15 A Well, we did have a Microsoft -- yeah.  
16 The DOE had set up, during that time, like a one  
17 book or one notebook, Microsoft something or  
18 another, I can't remember. We all had access to  
19 it. It was called the GNETS Director's Notebook  
20 and those documents were in there, you know, the  
21 documents that, you know, GNETS resources and --  
22 but those documents were in there listed as, you  
23 know, consideration of services, documents,  
24 forms, or whatever how they were saved, they  
25 were, you know, in there -- that notebook. I